

# **EXHIBIT 2**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

BANK POLICY INSTITUTE, OHIO CHAMBER OF COMMERCE, OHIO BANKERS LEAGUE, AMERICAN BANKERS ASSOCIATION and CHAMBER OF COMMERCE OF THE UNITED STATES OF AMERICA,

Plaintiffs,

v.

BOARD OF GOVERNORS OF THE  
FEDERAL RESERVE SYSTEM,

Defendant.

Case No. 2:24-cv-04300  
District Judge Algenon L. Marbley  
Magistrate Judge Chelsey M. Vascura

**Declaration of M. Anthony Long**

1. My name is M. Anthony Long, and I am General Counsel of Plaintiff Ohio Chamber of Commerce (“Ohio Chamber”).

2. Unless otherwise stated, this Declaration is based upon my personal knowledge and belief and/or upon my review of business records of the Ohio Chamber. If called as a witness, I could and would testify competently thereto.

3. The Ohio Chamber is a voluntary business association supporting free enterprise, competition, and economic growth in the State of Ohio. This has included opposing bank capital rules that make it more difficult for banks to extend credit to small businesses, thereby harming the local economy in Ohio.

4. The Ohio Chamber has opposed bank capital rules that make it more difficult for banks to extend credit to small businesses, thereby harming the local economy in Ohio. *See Steve*

Stivers, Ohio Chamber of Commerce, *New Banking Rules Would Hurt Ohio Farmers and Manufacturers* (May 13, 2024).

5. Many Ohio Chamber members or their affiliated entities submitted comment letters on the proposed Enhanced Disclosure of the Models Used in the Federal Reserve's Supervisory Stress Test document, 82 Fed. Reg. 59,547 (Dec. 15, 2017), the proposed Stress Testing Policy Statement, 82 Fed. Reg. 59,528 (Dec. 15, 2017), the proposed Policy Statement on the Scenario Design Framework for Stress Testing, 82 Fed. Reg. 59,533 (Dec. 15, 2017), and/or the proposed Amendments to the Regulatory Capital, Capital Plan, and Stress Test Rules, 83 Fed. Reg. 18,160 (Apr. 25, 2018).

6. Numerous Ohio Chamber members or their parent entities are subject to the Board of Governors of the Federal Reserve System's stress tests and the stress-capital buffer, including Bank of America; Fifth Third Bancorp; Huntington Bancshares Inc.; JPMorgan Chase & Co.; The PNC Financial Services Group, Inc.; and U.S. Bancorp. All of these members or their affiliates are headquartered in Ohio and all have substantial operations in Ohio, including in the Southern District of Ohio.

7. The actions challenged in this case conflict with the Ohio Chamber's policy objectives, and challenging the actions is germane to the organizational purpose of the Ohio Chamber. The Ohio Chamber supports and advocates for banks that are subject to the stress tests, and also represents the interests of businesses affected by banks' restricted ability to lend under the Board's stress-test regime.

8. The Ohio Chamber maintains its principal place of business in Columbus, Ohio.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 9<sup>th</sup> day of March, 2025, at 34 S. 3rd Street, Columbus, OH 43215.

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**M. Anthony Long**

*On behalf of the Ohio Chamber of Commerce*